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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 AXS GROUP LLC,
11 Plaintiff,

12 v.

13 INTERNET REFERRAL SERVICES,
14 LLC, EVENT TICKETS CENTER,
15 INC., VERIFIED-TICKET.COM,
16 AMOSA.APP, and SECURE.TICKETS,
Defendants.

Case No. 2:24–CV–00377 CAS (EX)

**[PROPOSED] ORDER GRANTING
LEAVE FOR EXPEDITED
DISCOVERY**

17 This Court, having read and considered the Complaint on file in this action by
18 Plaintiff AXS Group LLC (“AXS”), AXS’s Motion for a Preliminary Injunction,
19 AXS’s *Ex Parte* Application for and Memorandum in Support of an Order Granting
20 Leave for Expedited Discovery, the Declarations of Alex Hazboun and J. Michael
21 Keyes filed in support thereof, being fully advised in the premises, and GOOD
22 CAUSE appearing therefore, hereby orders as follows:

23 **ORDER AUTHORIZING EXPEDITED DISCOVERY**

24 **A. IT IS ORDERED** as sufficient cause has been shown, that: AXS may
25 serve subpoenas pursuant to Rule 45 of the Federal Rules of Civil Procedure on any
26 third-party domain registrar that is known or is learned to be affiliated with any
27 Defendant in order to permit AXS to discover that Defendant’s true identity.
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1 **B. IT IS FURTHER ORDERED** as sufficient cause has been shown, that:

2 1) To the extent Defendants respond to Plaintiff's Motion for Preliminary
3 Injunction by denying that they are involved in the marketing, sale, or
4 distribution of Counterfeit Tickets or that they are unaffiliated or unassociated
5 with the remaining Defendants, Plaintiff AXS may conduct a limited Rule
6 30(b)(6) deposition of each Defendant on the following topics:

7 (a) that Defendant's business model and role in marketing, offering for
8 sale, selling, displaying, or distributing counterfeit tickets; (b) that
9 Defendant's relationship, association, or affiliation with any of the other
10 Defendants; (c) that Defendant's knowledge of the sale or distribution
11 of counterfeit AXS tickets through its domain(s), servers, or other
12 systems as set forth in the Complaint; (d) the identity of all websites or
13 domains owned or operated by that Defendant or its affiliates which are
14 used to market, sell, or distribute tickets; (e) the original sources of any
15 counterfeit tickets marketed, sold, or distributed through that
16 Defendant's websites or domains; and (f) that Defendant's knowledge
17 of Plaintiff or its services and/or that Defendant's access to the AXS
18 Platform.

19 2) Plaintiff AXS may issue Rule 34 Requests for Production pursuant to Federal
20 Rules of Civil Procedure 26 and 34 and Defendants shall produce all
21 documents responsive to such requests within fourteen (14) days of service.

22 The Requests for Production may seek information on the following topics:

23 (a) the identity of that Defendant's customers of digital tickets bearing
24 the AXS marks; (b) that Defendant's communications with each of the
25 other Defendants relating to the marketing, sale, or distribution of digital
26 tickets; (c) the identity of all websites or domains owned or operated by
27 that Defendant or its affiliates which are used to market, sell, or
28 distribute tickets; (d) the original sources of any counterfeit tickets

1 marketed, sold, or distributed through that Defendant's websites or
2 domains; (e) that Defendant's knowledge of Plaintiff or its services
3 and/or that Defendant's access to the AXS Platform; and (f) evidence of
4 that Defendant's revenue received from the marketing, sale, or
5 distribution of digital tickets bearing the AXS Marks.

6 **IT IS SO ORDERED.**

7 SIGNED this _____ day of _____, 2024, at _____ .m.
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12 UNITED STATES DISTRICT JUDGE
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